

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

KYDAISHA BURTON, individually and as
Mother, Next Friend, and Natural Guardian
of K.B., her minor child, and KESHAW
CAMPBELL, individually,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 1:21-CV-17 (LAG)

CONSENT MOTION FOR EXTENSION OF TIME

Defendant United States of America, by and through the United States Attorney for the Middle District of Georgia, respectfully requests a ten-day extension to file a motion related to joining parties. The current deadline to amend the pleadings or join parties is Friday, March 24, 2023. See Scheduling and Discovery Order, ECF No. 24 at 1. The United States requests, and Plaintiffs consent to, a short extension until Monday, April 3, 2023.

The ten-day extension is warranted for good cause because counsel for the United States in this case will be in a jury trial next week and counsel is also contending with competing obligations in other assigned matters. A short extension is warranted to allow time to fully brief those issues that require the Court's attention and should have no effect on any other internal deadlines set forth in the Court's Scheduling and Discovery Order, ECF No. 24.

Undersigned counsel discussed this motion with Plaintiffs' counsel via email and is authorized to represent that Plaintiffs consent to the ten additional days, but expressly reserve the right to object to the motion to join and file a response in opposition.

Respectfully submitted this 17th day of March, 2023.

PETER D. LEARY
UNITED STATES ATTORNEY

By: s/ E. Bowen Reichert Shoemaker
E. BOWEN REICHERT SHOEMAKER
Assistant United States Attorney
Georgia Bar No. 222443
LANCE SIMON
Assistant United States Attorney
Georgia Bar No. 447643
UNITED STATES ATTORNEY'S OFFICE
Post Office Box 1702
Macon, Georgia 31202-1702
Telephone: (478) 752-3511
Bowen.Shoemaker@usdoj.gov
Lance.Simon@usdoj.gov